

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

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RALPH S. JANVEY, IN HIS CAPACITY AS
COURT-APPOINTED RECEIVER FOR THE
STANFORD RECEIVERSHIP ESTATE,
AND THE OFFICIAL STANFORD
INVESTORS COMMITTEE,

Plaintiffs,

Case No. 3:13-cv-00477-N

- against -

PROSKAUER ROSE LLP, CHADBOURNE
& PARKE LLP, AND THOMAS V.
SJOBLOM,

Defendants.

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UNOPPOSED MOTION TO EXTEND PAGE LIMITATION

Defendant Chadbourne & Parke LLP (“Chadbourne”) respectfully moves this Court for permission to file a brief in support of its forthcoming Motion to Dismiss Plaintiffs’ Original Complaint that exceeds the page limitation set forth in Local Rule of Civil Procedure 7.2(c). Chadbourne’s Motion to Dismiss is due on October 3, 2014. Plaintiffs do not oppose Chadbourne’s request for an extension of the page limitation.

Chadbourne respectfully submits that an extension of the page limitation is necessary and warranted in this case. Plaintiffs’ Original Complaint is 110 pages, and 273 paragraphs, long. It asserts seven causes of action against Chadbourne, and alleges that Chadbourne is responsible for the loss of “billions of dollars in assets.” Pls.’ Original Compl., *Janvey, et al. v. Proskauer Rose LLP, et al.*, No. 3:13-cv-00477-N (N.D. Tex.), at ¶ 270 (Dkt.

No. 1) (Jan. 31, 2013). Given the magnitude and multiplicity of the claims asserted in Plaintiffs' Original Complaint, Chadbourne believes that the requested extension is reasonable.

Chadbourne therefore asks this Court for permission to file a brief in excess of twenty-five (25), and not to exceed fifty (50), pages in support of its forthcoming Motion to Dismiss Plaintiffs' Original Complaint.

Dated: September 23, 2014

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CERTIFICATE OF CONFERENCE

Pursuant to Local Rules of Civil Procedure 7.1(a) and 7.1(b), on September 21, 2014, counsel for defendant Chadbourne & Parke LLP conferred with counsel for plaintiffs. Plaintiffs' counsel stated that they are not opposed to Chadbourne & Parke LLP's request for an extension of the page limitation.

/s/ Daniel J. Beller

Daniel J. Beller

CERTIFICATE OF SERVICE

On September 23, 2014, I electronically submitted the foregoing document upon the attorneys of record in the above case, in accordance with Federal Rule of Civil Procedure 5 and Local Rule of Civil Procedure 5.4(c), by causing a copy of the same to be filed via the electronic case filing system of the United States District Court for the Northern District of Texas.

/s/ Daniel J. Beller

Daniel J. Beller